

**Exhibit B**

The Elrod Declaration

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, *et al.*,

Debtors.

Case No. 23-90147  
Jointly Administered

(Chapter 7)

Judge Eduardo V. Rodriguez

**DECLARATION OF JOHN D. ELROD IN SUPPORT OF THE  
APPLICATION OF THE CHAPTER 7 TRUSTEE FOR ENTRY OF AN  
ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT  
OF GREENBERG TRAURIG, LLP AS SPECIAL  
LITIGATION COUNSEL**

I, John D. Elrod, hereby state:

1. I am a Shareholder at the international law firm of Greenberg Traurig, LLP (“Greenberg Traurig”), proposed special litigation counsel to Janet S. Northrup, solely in her capacity as the Chapter 7 Trustee (the “Trustee”) for the estates of Mountain Express Oil Company, *et al.* (collectively, the “Debtors”). Greenberg Traurig maintains offices throughout the United States, including at Terminus 200, 3333 Piedmont Road NE, Suite 2500, Atlanta, Georgia 30305. I am a member in good standing of the State Bar of Georgia, and I have been admitted to practice in the United States Court of Appeals for the Eleventh Circuit, and United States District Courts for the Northern, Eastern, and Western Districts of Texas.

2. I submit this declaration (the “Declaration”) on behalf of Greenberg Traurig in support of the Application (the “Application”)<sup>2</sup> of the Trustee to retain Greenberg Traurig as special litigation counsel, effective as of November 11, 2023, and to provide the disclosures under the Bankruptcy Code, the rules of this Court and Bankruptcy Rule 2014(a).

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<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have those meanings set forth in the Application.

3. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto. Certain of the disclosures set forth herein relate to matters not within my personal knowledge, but rather within the personal knowledge of other attorneys and employees at Greenberg Traurig and are based on information derived from Greenberg Traurig's internal records provided by them to me.

**SCOPE OF EMPLOYMENT**

4. The professional services that the Trustee expects that Greenberg Traurig will be called upon to render include, but shall not be limited to, the following:

- a) prosecuting claims and causes of action against the Debtors' former insiders, and other individuals and entities responsible for the Debtors' insolvency;
- b) preparing and reviewing pleadings, motions and correspondence related to that litigation;
- c) appearing at proceedings before this Court in connection with such matters;
- d) advising the Trustee with respect to the litigation; and
- e) performing such other legal services as may be required in connection with the litigation.

While Greenberg Traurig will continue to represent the Agent (as defined below) in these Cases generally, with respect to the foregoing matters, it shall represent solely the Trustee.

**GREENBERG TRAUIG DOES NOT HOLD OR REPRESENT ANY INTEREST  
ADVERSE TO THE DEBTORS OR THE CHAPTER 7 ESTATES  
WITH RESPECT TO THE SPECIAL MATTERS ON WHICH IT IS EMPLOYED**

5. Except as disclosed herein, to the best of my knowledge and information after due inquiry, other than the Agent, Greenberg Traurig has no connection with the Debtors, their creditors, any other party in interest herein or their respective attorneys or professionals and does not hold or represent any entity having an adverse interest in connection with these Cases. For so long as Greenberg Traurig represents the Trustee, and absent further order of this Court, Greenberg

Traurig will not represent any entity other than the Trustee and the Agent in connection with these Cases.

6. As more fully described hereinafter, Greenberg Traurig maintains a list of Greenberg Traurig's current and former engagements, clients, and adverse parties going back three (3) years (the "Client Database"). Greenberg Traurig maintains and systematically updates its Client Database in the ordinary course of business, and it is the regular practice of Greenberg Traurig to make and maintain these records.

7. In connection with preparing this Declaration, I caused to be submitted to, and checked against, that Client Database all those names set forth on Schedule 1 attached hereto, provided to the Trustee by the Debtors, which names include: (a) Debtors and Non-Debtor Affiliates; (b) Directors and Officers; (c) Interested Parties; (d) Judges and Office of U.S. Trustee for the Southern District of Texas; (e) Lenders; (f) Litigation Parties; (g) Ordinary Course Professionals; (h) Professionals; (i) Secured Parties; (j) Senior Management; and (k) Top Unsecured Creditors (collectively, the "Potentially Interested Parties"). Greenberg Traurig compared the names of the Potentially Interested Parties against a list of Greenberg Traurig's current and former engagements, clients and adverse parties (the "Client Database"). As the identity of any additional Potentially Interested Parties becomes known, Greenberg Traurig will supplement this Declaration to the extent necessary.

8. This inquiry revealed that certain of the Potentially Interested Parties are current or former Greenberg Traurig clients (the list of such clients is attached hereto as Schedule 2 and is incorporated herein by reference and is referred to herein as the "Client Match List"). Through the information generated from the above-mentioned inquiry and, to the extent necessary, through follow-up inquiries with Greenberg Traurig attorneys responsible for parties listed on the Client

Match List, except as disclosed herein, Greenberg Traurig determined that the representation of those clients on the Client Match List concerned matters unrelated to the Debtors or these Cases.

Greenberg Traurig hereby makes the following specific disclosures:

- Greenberg Traurig represents First Horizon Bank, as Agent in these Cases (the “Agent”). The 2022 revenue collected from Greenberg Traurig’s representation of the Agent constitutes less than one percent (1%) of Greenberg Traurig’s total revenue. Greenberg Traurig will not represent the Trustee in any matters adverse to the Agent or the lenders in the bank group.
- Greenberg Traurig previously represented Blue Owl Real Estate Capital, LLC f/k/a Oak Street Real Estate Capital, LLC (“Blue Owl”) in discrete matters wholly unrelated to the Debtors or these Cases. Blue Owl never paid Greenberg Traurig any fees associated with that work. Those matters have concluded and no attorney who provided services to Blue Owl will provide services to the Trustee.
- Lawrence Perkins (“Mr. Perkins”) was an independent director who joined the board of Mountain Express Oil Company, one of the Debtors, prior to the Petition Date. Although Greenberg Traurig has not represented Mr. Perkins in his individual capacity, Greenberg Traurig currently represents SierraConstellation Partners (“SCP”), where Mr. Perkins currently serves as the chief executive officer, in a matter unrelated to these Cases. Specifically, Greenberg Traurig represents SCP, as a liquidating trustee, in a matter unrelated to these cases. Additionally, GT currently represents an entity affiliated with SCP (Alieria LT, LLC) as liquidating trustee in The Alieria Companies, Inc. bankruptcy cases pending in Delaware.
- Greenberg Traurig previously represented various landlord entities, AFN ABSPROP001, LLC, ARG MEVNAAAL001, LLC, ARG MESMOA001, LLC, and ARG ME19PCK001, LLC in a lease dispute against three of the Debtors, Mex North Alabama, LLC, Mountain Express Oil Company, and Texas MEX Limited Company, LLC, who served as guarantors under the applicable leases. This representation has concluded.
- Greenberg Traurig represented the Necessary Retail REIT, Inc. in a commercial lease dispute against the Debtors prior to and in early in these Cases. Greenberg Traurig withdrew from that representation early in these Cases. The properties at issue in that dispute were leased by the Necessary Retail REIT, Inc. to the Debtors, and the leases have now been terminated. Greenberg Traurig continues to represent the Necessary Retail REIT, Inc. in matters unrelated to these Cases.

- Greenberg Traurig represents McDonald's Corporation in a property dispute against one of the Debtors' former landlords, Mountain Portfolio Owner NJ, LLC, relating to property once leased to the Debtors. This representation is unrelated to these Cases.

9. Greenberg Traurig's proposed representation of the Trustee will not involve the commencement or prosecution of any action in connection with these Cases asserting: (i) any challenge to the allowance, enforceability, priority, amount, extent or payment of any indebtedness owed by any party to the Agent or any member of the bank group, to the attachment, perfection, extent or priority of any of the liens securing any such indebtedness, or (ii) any claim, counterclaim or cross-claim against the Agent or any member of the bank group of any kind whatsoever (whether based upon lender liability, fraud, misrepresentation, dishonest conduct or otherwise). To the extent that the Trustee deems any such actions necessary or appropriate, such actions will be handled by other counsel, and Greenberg Traurig will not investigate claims against these parties. Additionally, upon its retention, Greenberg Traurig's investigation and prosecution of the estates' claims and causes of action shall be solely directed by the Trustee and shall inure to the benefits of the estates.

10. None of Greenberg Traurig's representations of these parties in interest comprises a material component of Greenberg Traurig's practice. To the best of my knowledge, the standard articulated by courts of the Fifth Circuit regarding the appointment of counsel by a Chapter 7 trustee has been met in these Cases and Greenberg Traurig represents no other entity having an adverse interest in connection with these Cases other than as disclosed herein.

11. Except for the continued representation of the Trustee and the Agent, neither I nor the Firm has or will represent any other entity in connection with these Cases. Neither I nor the Firm have or will accept any compensation from any creditor (other than the Agent) or other party in interest in these Cases, except compensation for services rendered to the Trustee and

reimbursement of necessary expenses from the Chapter 7 estates upon appropriate application to the Court.

12. Through a firm wide e-mail, Greenberg Traurig also solicited information from its attorneys to determine if any attorneys employed by Greenberg Traurig are related to any United States Bankruptcy Judges for the Southern District of Texas, including the Honorable Eduardo V. Rodriguez, the Bankruptcy Judge presiding over these Cases, the United States Trustee for Region 7, or any person employed in the Office of the United States Trustee for Region 7. Greenberg Traurig further solicited information from its attorneys to determine if any attorneys employed by Greenberg Traurig (i) are investors in the Debtors or (ii) were, within two years of the Petition Date, a director, officer, or employee of the Debtors. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after due inquiry, other than in connection with these Chapter 11 Cases, no such connections were discovered. In the event that any additional information is discovered, Greenberg Traurig will supplement this Declaration to the extent necessary.

13. Based on the foregoing and except as set forth herein, neither I, Greenberg Traurig, nor any shareholder, counsel, or associate thereof, insofar as I have been able to ascertain based on the information currently available to me, represents any interest adverse to the Chapter 7 estates. To the best of my knowledge, information and belief, Greenberg Traurig is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code in that Greenberg Traurig, its shareholders, counsel and associates:

- (a) are not creditors, equity security holders or insiders of the Debtor;
- (b) are not and were not, within two (2) years before the date of the filing of the Debtors’ chapter 11 petitions, a director, officer, or employee of the Debtors; and

- (c) do not have an interest materially adverse to the interest of the estate or any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors or for any other reason.

14. To the best of my knowledge and information, other than as identified in this Declaration, Greenberg Traurig has no connection with the Debtors, their significant creditors, other parties in interest herein, their current respective attorneys or professionals, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, and does not hold or represent any entity having an adverse interest in connection with these Cases, except as disclosed herein.

15. Greenberg Traurig has also advised the Trustee that it will conduct an ongoing review of its files to ensure no conflicts or other disqualifying circumstances exist or arise. If any new material facts or relevant relationships are discovered or arise, Greenberg Traurig will supplement its disclosures to the Court.

#### **PROFESSIONAL COMPENSATION**

16. Subject to this Court's approval and in accordance with Sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and the rules and other procedures that may be fixed by this Court, the Trustee requests that Greenberg Traurig be compensated on a contingency fee basis, as follows:

- 25% of any recovery before 6 months after demand is made (the "6-Month Mark");
- 28% from the 6-Month Mark to the close of discovery in any associated litigation;
- 30% after the close of discovery until the entry of a pre-trial order; and
- 33% after the entry of the pretrial order through the conclusion of the trial court litigation.

17. Greenberg Traurig will be reimbursed by the Chapter 7 estates for its actual and necessary expenses incurred in pursuing the litigation including, but not limited to, photocopies, courier service, computer assisted research, docket and court filing fees, travel, court reporting



charges, and any other incidental costs advanced by the firm specifically for these special litigation matters.

18. Greenberg Traurig intends to apply for compensation for professional services rendered in connection with these Cases subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and Orders of this Court, on a contingency fee basis, plus reimbursement of actual, necessary expenses and other charges incurred by Greenberg Traurig.

19. Other than as set forth above and in the Application, there is no proposed arrangement to compensate Greenberg Traurig in connection with its representation of the Trustee.

20. By reason of the foregoing, I believe Greenberg Traurig is eligible for employment and retention by the Trustee pursuant to section 327(c) and the applicable Bankruptcy Rules.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of December, 2023.

/s/ John D. Elrod

John D. Elrod, solely in his capacity as a  
Shareholder of Greenberg Traurig, LLP

**Schedule 1**

## Potentially Interested Parties

<b>Category</b>	<b>Name</b>
Debtor & Non-Debtor Affiliates	1200 Wego LLC
Debtor & Non-Debtor Affiliates	1227 Veterans, LLC
Debtor & Non-Debtor Affiliates	1308 Jefferson Davis LLC
Debtor & Non-Debtor Affiliates	13289 Old Hammond Highway LLC
Debtor & Non-Debtor Affiliates	1600 Manhattan Blvd, LLC
Debtor & Non-Debtor Affiliates	2601 Gen. Degaulle LLC
Debtor & Non-Debtor Affiliates	2698 Barataria Blvd LLC
Debtor & Non-Debtor Affiliates	2701. Canal Street LLC
Debtor & Non-Debtor Affiliates	2850 Belle Chasse Hwy LLC
Debtor & Non-Debtor Affiliates	300 Lee Drive LLC
Debtor & Non-Debtor Affiliates	3049 Loyola Drive L.L.C.
Debtor & Non-Debtor Affiliates	4 Court Solutions
Debtor & Non-Debtor Affiliates	4115 Airline Hwy, LLC
Debtor & Non-Debtor Affiliates	4408 S. I-10 Service Road LLC
Debtor & Non-Debtor Affiliates	4520 Jefferson Highway LLC
Debtor & Non-Debtor Affiliates	4662 GDD LLC
Debtor & Non-Debtor Affiliates	4915 Westbank Expwy LLC
Debtor & Non-Debtor Affiliates	4940 Groom Road, L.L.C.
Debtor & Non-Debtor Affiliates	5310 Flannery Road LLC
Debtor & Non-Debtor Affiliates	798 Jean Lafitte, L.L.C.
Debtor & Non-Debtor Affiliates	8692 River Road, LLC
Debtor & Non-Debtor Affiliates	9410 Greenwell Springs, LLC
Debtor & Non-Debtor Affiliates	Adelphi Transport, LLC
Debtor & Non-Debtor Affiliates	Alabama Terminal Property, LLC
Debtor & Non-Debtor Affiliates	Avondale Brothers No 128 LLC
Debtor & Non-Debtor Affiliates	Avondale Investments, L.L.C.
Debtor & Non-Debtor Affiliates	B&T Petroleum LLC
Debtor & Non-Debtor Affiliates	Brothers Belle Chasse, L.L.C.
Debtor & Non-Debtor Affiliates	Brothers Carol Sue, LLC
Debtor & Non-Debtor Affiliates	Brothers Expressway, Inc.
Debtor & Non-Debtor Affiliates	Brothers I-10 Service Road, Inc.
Debtor & Non-Debtor Affiliates	Brothers Petroleum, L.L.C.
Debtor & Non-Debtor Affiliates	Brothers Stonebridge, Inc.
Debtor & Non-Debtor Affiliates	Brothers Terry Parkway, Inc.
Debtor & Non-Debtor Affiliates	Consolidated HR Services LLC
Debtor & Non-Debtor Affiliates	Crowder Brothers, LLC

Category	Name
Debtor & Non-Debtor Affiliates	Exxon General Degaulle, LLC
Debtor & Non-Debtor Affiliates	Gause Operation, L.L.C.
Debtor & Non-Debtor Affiliates	Jamie Boulevard, LLC
Debtor & Non-Debtor Affiliates	Lapalco Brothers No. 125 LLC
Debtor & Non-Debtor Affiliates	Madison Auto Truck Plaza and Lucky Dollar Casino, LLC
Debtor & Non-Debtor Affiliates	MEX Fuels LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE-IL LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE-IN LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE-KY LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE-NJ LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE-NY LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NE-OH LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NW LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NW-IA LLC
Debtor & Non-Debtor Affiliates	MEX Fuels NW-MO LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SE LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SE-GA LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SE-MS LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SE-TN LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SW LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SW-LA LLC
Debtor & Non-Debtor Affiliates	MEX Fuels SW-OK LLC
Debtor & Non-Debtor Affiliates	MEX North Alabama, LLC
Debtor & Non-Debtor Affiliates	MEX RE Holdings LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE-IN LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE-NJ LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE-NY LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE-NY-LI LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE-OH LLC
Debtor & Non-Debtor Affiliates	MEX RE-NE-PA LLC
Debtor & Non-Debtor Affiliates	MEX RE-NW LLC
Debtor & Non-Debtor Affiliates	MEX RE-NW-IA
Debtor & Non-Debtor Affiliates	MEX RE-NW-KS LLC
Debtor & Non-Debtor Affiliates	MEX RE-NW-MN
Debtor & Non-Debtor Affiliates	MEX RE-NW-MO
Debtor & Non-Debtor Affiliates	MEX RE-NW-ND LLC
Debtor & Non-Debtor Affiliates	MEX RE-NW-WI LLC

Category	Name
Debtor & Non-Debtor Affiliates	MEX RE-SE LLC
Debtor & Non-Debtor Affiliates	MEX RE-SE-AL LLC
Debtor & Non-Debtor Affiliates	MEX RE-SE-FL-LLC
Debtor & Non-Debtor Affiliates	MEX R -SE-GA LLC
Debtor & Non-Debtor Affiliates	MEX RE-SE-MS LLC
Debtor & Non-Debtor Affiliates	MEX RE-SE-NC LLC
Debtor & Non-Debtor Affiliates	MEX RE-SW LLC
Debtor & Non-Debtor Affiliates	MEX RE-SW-AR LLC
Debtor & Non-Debtor Affiliates	MEX RE-SW-LA LLC
Debtor & Non-Debtor Affiliates	MEX RE-SW-OK LLC
Debtor & Non-Debtor Affiliates	MEX RE-SW-TX LLC
Debtor & Non-Debtor Affiliates	MEX-RE-SE-SC-LLC
Debtor & Non-Debtor Affiliates	MEX-RE-SE-TN LLC
Debtor & Non-Debtor Affiliates	Mississippi MEX Company, LLC
Debtor & Non-Debtor Affiliates	Mountain Express Baking and Coffee Co.
Debtor & Non-Debtor Affiliates	Mountain Express Ethanol Company
Debtor & Non-Debtor Affiliates	Mountain Express Oil Company
Debtor & Non-Debtor Affiliates	Mountain Express Oil Company Southeast, LLC
Debtor & Non-Debtor Affiliates	Newton Brothers, Inc.
Debtor & Non-Debtor Affiliates	South Claiborne Operation LLC
Debtor & Non-Debtor Affiliates	Spartan Tank Management LLC
Debtor & Non-Debtor Affiliates	Star Mountain Express, LLC
Debtor & Non-Debtor Affiliates	Texas MEX Limited Company LLC
Debtor & Non-Debtor Affiliates	Webster P II L.L.C.
Debtor & Non-Debtor Affiliates	Webster P.L.L.C.
Debtor & Non-Debtor Affiliates	West Hill Ranch Group LLC
Debtor & Non-Debtor Affiliates	West Hill Ranch Investors, LLC
Debtor & Non-Debtor Affiliates	WHRG Retail Ops LLC
Debtor & Non-Debtor Affiliates	WHRG TC LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NE LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NE-PA LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NW LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NW-IA LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NW-KS LLC
Debtor & Non-Debtor Affiliates	WHRG TC- W-MO LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NW-ND LLC
Debtor & Non-Debtor Affiliates	WHRG TC-NW-WY LLC
Debtor & Non-Debtor Affiliates	WHRG TC-SE LLC
Debtor & Non-Debtor Affiliates	WHRG TC-SE-AL LLC
Debtor & Non-Debtor Affiliates	WHRG TC-SE-SC LLC

Category	Name
Debtor & Non-Debtor Affiliates	WHRG TC-SW LLC
Debtor & Non-Debtor Affiliates	WHRG TC-SW LLC
Debtor & Non-Debtor Affiliates	WHRG TC-SW-AR LLC
Debtor & Non-Debtor Affiliates	WHRG TC-SW-LA LLC
Debtor & Non-Debtor Affiliates	WHRG-LA, LLC
Debtor & Non-Debtor Affiliates	WHRG-LA2, LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NE LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NE-NY LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NE-NY-LI LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NE-PA LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW LLC
Debtor & Non-Debtor Affiliates	WI-IRGOPS NW-IA LLC
Debtor & Non-Debtor Affiliates	WI-IRGOPS NW-IA-WIA LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW-MI LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW-MO LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW-MO-NMO LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW-WI LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW-WI-NWI LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SE LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SE-AL-NORTH LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SE-SC LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SE-TN LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SE-TN-WTN LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-AR LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-AR-NWAR LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-OK LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-OK-OKC LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-TX LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-TX-DALLAS LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SW-TX-STX LLC
Debtor & Non-Debtor Affiliates	WHRGOPS NW-KS LCC
Debtor & Non-Debtor Affiliates	WHRGOPS SE-MS LLC
Debtor & Non-Debtor Affiliates	WHRGOPS SE-MS-JACKSON LLC
Directors & Officers	Craig Barbarosh
Directors & Officers	Lamar Frady
Directors & Officers	Lawrence Perkins
Directors & Officers	Turjo Wadud
Interested Party	GPM Investments, LLC
Interested Party	Lalani Petroleum LLC

Category	Name
Judges & Office of US Trustee S.D. Tex	Chief Judge Eduardo V. Rodriguez
Judges & Office of US Trustee S.D. Tex	Judge Christopher M. Lopez
Judges & Office of US Trustee S.D. Tex	Judge David R. Jones
Judges & Office of US Trustee S.D. Tex	Judge Jeffrey P. Norman
Judges & Office of US Trustee S.D. Tex	Judge Marvin Isgur
Judges & Office of US Trustee S.D. Tex	Alethea Caluza
Judges & Office of US Trustee S.D. Tex	Alicia Barcomb
Judges & Office of US Trustee S.D. Tex	Brian Henault
Judges & Office of US Trustee S.D. Tex	Christopher R. Travis
Judges & Office of US Trustee S.D. Tex	Christy Simmons
Judges & Office of US Trustee S.D. Tex	Clarissa Waxton
Judges & Office of US Trustee S.D. Tex	Glenn Otto
Judges & Office of US Trustee S.D. Tex	Gwen Smith
Judges & Office of US Trustee S.D. Tex	Ha Nguyen
Judges & Office of US Trustee S.D. Tex	Hector Duran
Judges & Office of US Trustee S.D. Tex	Ivette Gerhard
Judges & Office of US Trustee S.D. Tex	Jana Whitworth
Judges & Office of US Trustee S.D. Tex	Jayson B. Ruff
Judges & Office of US Trustee S.D. Tex	Linda Motton
Judges & Office of US Trustee S.D. Tex	Luci Johnson-Davis
Judges & Office of US Trustee S.D. Tex	Millie Aponte Sall
Judges & Office of US Trustee S.D. Tex	Samantha Chilton
Judges & Office of US Trustee S.D. Tex	Stephen Statham
Judges & Office of US Trustee S.D. Tex	Yasmine Rivera
Landlord	Blue Owl Real Estate Capital, LLC f/k/a Oak Street Real Estate Capital, LLC
Landlord	Oak Street
Lender	Bank of Hope
Lender	Cadence Bank, N.A.
Lender	Cadence Bank, N.A.
Lender	First Horizon Bank f/k/a IBERIABANK
Lender	Hancock Whitney Bank
Lender	Pinnacle Bank
Lender	South State Bank
Lender	Synovus Bank
Lender	United Community Bank
Litigation	Aaron Palmer
Litigation	AFN ABSPROP00I LLC c/o BYBEE & TIBBALS, LLC
Litigation	AFN ABSPROP00I LLC c/o Daniel Coiker Horton & Bell, P.A.

Category	Name
Litigation	AFN ABSPROP00I LLC c/o GREENBERG TRAURIG, LLP
Litigation	AFN ABSPROP00I LLC c/o Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.
Litigation	Anderson O'Neal
Litigation	Aaron Palmer
Litigation	Azhar M. Chaudhary
Litigation	Douglas E. Berger
Litigation	Freeman Mathis & Gary LLP
Litigation	Freeway Stores OK LLC c/o McAfee & Taft
Litigation	Gary Freed
Litigation	Hegel Laurent Esq.
Litigation	Joseph V. Dirosa, Jr.
Litigation	Joshua S. Berger
Litigation	Law Offices of James Scott Farrin
Litigation	Richard A. Tonry, II
Ordinary Course Professional	Aceel IP Law, PLLC
Ordinary Course Professional	Allison U. Rovira, Attorney at Law
Ordinary Course Professional	Bondurant Mixson & Elmore LLP
Ordinary Course Professional	Burkhalter Law
Ordinary Course Professional	Canero Lammers Faclul Acevedo, PLLC
Ordinary Course Professional	Clifton, Larson, Allen, LLP
Ordinary Course Professional	Confiance Business Solutions, Inc
Ordinary Course Professional	Crowley Fleck
Ordinary Course Professional	David M. DeClement, Esq., Attorney at Law
Ordinary Course Professional	GableGotwals
Ordinary Course Professional	HooverSlovacek LLP
Ordinary Course Professional	James T. Johnston, Jr., LLC
Ordinary Course Professional	Leonard L. Levenson & Associates
Ordinary Course Professional	McCormick   Landry Munoz, PLLC
Ordinary Course Professional	Nichols, Cauley & Associates, LLC
Ordinary Course Professional	Parker Poe Adams & Bernstein, LLP
Ordinary Course Professional	Robison Curphey & O'Connell
Ordinary Course Professional	Speedy Inventory, LLC
Ordinary Course Professional	Wimberley, Lawson Steckel, Schneider
Ordinary Course Professional	Young Moore and Henderson, P.A.
Professionals	BOO USA LLP
Professionals	Allen & Overy
Professionals	Alvarez and Marsal
Professionals	Grant Thornton
Professionals	Greenberg Traurig



Category	Name
Professionals	Kirkland & Ellis LLP
Professionals	Pachulski Stang Ziehl & Jones LLP
Professionals	Raymond James & Associates, Inc.
Secured Parties	BancorpSouth Bank
Secured Parties	BB&T Commercial Equipment Capital
Secured Parties	Cary Oil Co., Inc.
Secured Parties	CT Corporation System, Representative
Secured Parties	ExxonMobil Corp.
Secured Parties	First Commonwealth Equipment Finance
Secured Parties	Hancock Whitney Bank
Secured Parties	IberiaBank, as Administrative Agent
Secured Parties	Navitas Credit Corp.
Secured Parties	NEPA Trading & Investments LLC
Secured Parties	Sinclair Oil LLC
Secured Parties	Sumitomo Mitsui Finance and Leasing Co., Ltd.
Secured Parties	TCF National Bank
Secured Parties	United Community Bank
Senior Management	Dustin Martin
Senior Management	Dennis Kirk
Senior Management	Brandon Frampton
Senior Management	Douglas Blankenship
Senior Management	Neil Lansing
Senior Management	Daniel Turcotte
Senior Management	Audra Stevens
Senior Management	Raven Cain
Top Unsecured Creditor	Andrews Distributing Company
Top Unsecured Creditor	Anthem Blue Cross Blue Shield
Top Unsecured Creditor	ARG 1 CBHGNJ001, LLC et al
Top Unsecured Creditor	CBE, Inc
Top Unsecured Creditor	Chevron
Top Unsecured Creditor	Coca-Cola Bottling Co.
Top Unsecured Creditor	Core-Mark AR
Top Unsecured Creditor	Crescent Crown Distributing
Top Unsecured Creditor	Cross Oil Refining & Marketing
Top Unsecured Creditor	DAS Distributors TC
Top Unsecured Creditor	ENTERGY
Top Unsecured Creditor	Exxon Mobil
Top Unsecured Creditor	Federated Insurance
Top Unsecured Creditor	Flying J-Saratoga-Pilot
Top Unsecured Creditor	Frito-Lay All



Category	Name
Top Unsecured Creditor	Golden Gallons LLC
Top Unsecured Creditor	Hunt Refining Company
Top Unsecured Creditor	Imperial Trading Company
Top Unsecured Creditor	JF Acquisition LLC
Top Unsecured Creditor	KeyBank Real Estate Capital
Top Unsecured Creditor	Marathon Petroleum
Top Unsecured Creditor	Pepsi Beverages
Top Unsecured Creditor	Shell
Top Unsecured Creditor	Sinclair Distributor Services
Top Unsecured Creditor	Southern Eagle Sales & Service, LP
Top Unsecured Creditor	Southern Glazer's Wine AND Spirits-LA
Top Unsecured Creditor	Sunoco
Top Unsecured Creditor	TBHC Deliveries, LLC
Top Unsecured Creditor	Total Image Solutions, LLC
Top Unsecured Creditor	Valero
Top Unsecured Creditor	VM Petro Inc

**Schedule 2**

## Client Match List

The following names were compared to the Client Database. As noted below, Greenberg Traurig has represented, in the past, or currently represents, and will likely represent in the future, certain Potentially Interested Parties, including various entities that may be related to or affiliated with the Potentially Interested Parties, in matters unrelated to the Debtors or these Cases.<sup>1</sup>

Due to the similarity of names of certain entities, Greenberg Traurig has on the Client Match List certain Potentially Interested Parties that may be current or former clients or affiliates of current or former clients. Greenberg Traurig may amend this Exhibit 2 to remove clients/client affiliates that it discovers are not related to parties in interest. However, out of an abundance of caution and in the interest of providing timely disclosures, Greenberg Traurig has listed these parties herein.<sup>2</sup>

<b>Name of Entity Searched</b>	<b>Brief Description of Relationship to Greenberg Traurig<sup>3</sup></b>
Bank of Hope	Current Client
Cadence Bank, N.A.	Current Client
Entergy Services Inc.	Current Client in unrelated matters
Exxon Mobile Corporation	Current Client in unrelated matters
GPM Investments, LLC	Current Client in unrelated matters
Grant Thornton	Current Client in unrelated matters
Hancock Whitney Bank	Current Client
First Horizon Bank f/k/a IBERIABANK	Current Client
Pinnacle Bank	Current Client
Raymond James & Associates, Inc.	Current Client in unrelated matters
Shell Energy North America (US), L.P.	Current Client in unrelated matters
South State Bank	Current Client
Southern Glazer's Wine and Spirits	Current Client in unrelated matters
Sumitomo Mitsui Banking - Trade Finance	Current Client in unrelated matters
Synovus Bank	Current Client
United Community Bank	Current Client

<sup>1</sup> Each entity identified in Exhibit 2 represents less than 1% of Greenberg Traurig's trailing twelve-month revenue.

<sup>2</sup> None of Greenberg Traurig's representations of Potentially Interested Parties in these Cases comprises a material component of Greenberg Traurig's practice, nor, except as disclosed herein and in the Elrod Declaration, does it represent such parties on any issue relating to the Debtors or their estates. However, it may become necessary to pursue legal action against certain parties who appear on the Client Match List. The Trustee may need to seek to retain other counsel to pursue such matters. Moreover, to the extent necessary and appropriate, Greenberg Traurig will implement an ethical wall, screening attorneys working on any such matters from interacting with attorneys working on these Cases.

<sup>3</sup> The term "Current Client" refers to an entity listed as a client in Greenberg Traurig's Client Database for whom time has been recorded in the past three years and Greenberg Traurig has at least one open matter. The term "Former Client" refers to an entity listed as a client in Greenberg Traurig's Client Database for whom time has been recorded in the past three years but all matters for such client have since been closed. Greenberg Traurig does not disclose connections if time was recorded more than three years before the Petition Date.